

December 12, 2016

(b) (6)

Dear (b) (6),

This letter is in response to your letter concerning scientific integrity in the IRIS Program dated November 25, 2014. As the Scientific Integrity Official of EPA, I have been asked to review your concerns. I sincerely apologize for the time it has taken to respond to your letter.

Since 2009, EPA has implemented several policies that improve transparency, and ensure scientific objectivity and independence in the IRIS Program. For example, the public discussions on early materials and draft IRIS assessments that occur during IRIS Bimonthly Public Science meetings are now augmented by independent experts identified by the National Academies' National Research Council (NRC) who are evaluated for conflicts of interest in accordance with established NAS procedures (for more information, please see <http://dels.nas.edu/global/best/IRIS-Experts> and <http://www.epa.gov/iris/iris-and-national-research-council-nrc>). EPA has also adopted language used by the Occupational Health and Safety Administration (OSHA) to request discussants and commenters to disclose conflicts of interests orally or in writing, and provide disclosures for research submitted or presented during IRIS public meetings (for more information, please see the February IRIS Bimonthly Public Science meeting website). Additionally, in July 2013, the IRIS Program announced a new peer review process through EPA's Science Advisory Board – Chemical Assessment Advisory Committee (SAB-CAAC) to independently peer review draft IRIS assessments. The SAB-CAAC is a scientific/technical federal advisory committee subject to the provisions of the Federal Advisory Committee Act (FACA), including those related to the disclosure of conflict of interests. These enhancements to the IRIS Program will help to ensure that the range of scientific perspectives presented to EPA is balanced by advice and peer review provided by independent experts.

In addition to the above safeguards, all EPA scientists must provide Agency ethics officials with financial disclosure forms that are carefully reviewed for conflicts of interest. If there is a conflict, EPA staff must either divest in any relevant financial interest or recuse themselves from

work that gives rise to the conflict. The Agency's recently adopted scientific integrity policy also specifies EPA's responsibility to conduct, utilize, and communicate scientific information with the highest degree of integrity and transparency to Agency's stakeholders, including the toxicological reviews developed by the IRIS Program. For more information on EPA's Scientific Integrity Policy, please visit <http://www.epa.gov/research/htm/scientific-integrity>.

Again, thank you for your interest in the scientific integrity of the IRIS Program. EPA management, and in particular the IRIS Program director, (b) (6), are dedicated to ensuring that all IRIS assessments adhere to these principles and are committed to having an open, transparent dialogue with all stakeholders in order to produce high-quality scientific assessments. If you have specific concerns about particular situations, panels, or reviewers, we will be happy to address them.

Sincerely,

Francesca T. Grifo, Ph.D.
Scientific Integrity Official